

EXHIBIT C

Case 1:21-cv-01117-MN-CJB Document 47-3 Filed 08/02/22 Page 2 of 4 PageID #: 946

From: Schoedel, Lisa M. <LSchoedel@jenner.com> on behalf of Schoedel, Lisa M. <LSchoedel@jenner.com>
Sent: Thursday, February 10, 2022 5:46 PM
To: John Downing <JDowning@kasowitz.com>; Nelson, David A. <DNelson@jenner.com>; Nekita A. Washington <NWashington@kasowitz.com>
Cc: WSOU v. NetGear (KASOWITZ) <WSOUvNetGear@kasowitz.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>; Peter Mazur <PMazur@devlinlawfirm.com>; Blumenfeld, Jack <JBlumenfeld@morrisnichols.com>; Ying, Jennifer <jying@morrisnichols.com>; Aly, Amr O. <AAly@jenner.com>; Esat, Yusuf <YESat@jenner.com>; Denti, Mitchell L. <MDenti@jenner.com>
Subject: RE: WSOU Investments, LLC v. Netgear, Inc., 21-cv-1117, -1119, -1120 (D. Del.)

John,

Thank you for the clarification. We will investigate and send you native file overlays for the other documents that were produced with placeholders that say "UNABLE TO CONVERT."

Regards,
Lisa

From: John Downing <JDowning@kasowitz.com>
Sent: Thursday, February 10, 2022 3:57 PM
To: Nelson, David A. <DNelson@jenner.com>; Nekita A. Washington <NWashington@kasowitz.com>
Cc: WSOU v. NetGear (KASOWITZ) <WSOUvNetGear@kasowitz.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>; Peter Mazur <PMazur@devlinlawfirm.com>; Blumenfeld, Jack <JBlumenfeld@morrisnichols.com>; Ying, Jennifer <jying@morrisnichols.com>; Aly, Amr O. <AAly@jenner.com>; Schoedel, Lisa M. <LSchoedel@jenner.com>; Esat, Yusuf <YESat@jenner.com>; Denti, Mitchell L. <MDenti@jenner.com>
Subject: RE: WSOU Investments, LLC v. Netgear, Inc., 21-cv-1117, -1119, -1120 (D. Del.)

External Email – Exercise Caution

David,

To clarify, the we understand that the issue identified below is widespread and applies to a significant number of the production. Are you planning on investigating and fixing the issue. Please let us know by COB today.

Thanks,

John

John Downing
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From: Nelson, David A. [<mailto:DNelson@jenner.com>]
Sent: Thursday, February 10, 2022 12:17 PM
To: Nekita A. Washington <NWashington@kasowitz.com>
Cc: WSOU v. NetGear (KASOWITZ) <WSOUvNetGear@kasowitz.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>; Peter Mazur <PMazur@devlinlawfirm.com>; Blumenfeld, Jack <JBlumenfeld@morrisnichols.com>; Ying, Jennifer <jying@morrisnichols.com>; Aly, Amr O. <AAly@jenner.com>; Schoedel, Lisa M. <LSchoedel@jenner.com>; Esat, Yusuf <YESat@jenner.com>; Denti, Mitchell L. <MDenti@jenner.com>
Subject: WSOU Investments, LLC v. Netgear, Inc., 21-cv-1117, -1119, -1120 (D. Del.)

WSOU Investments, LLC v. Netgear, Inc., 21-cv-1117, -1119, -1120 (D. Del.)

Nekita:

I will be forwarding to you an overlay production containing the eight native files requested below. The transmission will come from our KiteWorks file transfer site.

Once downloaded, the password to access the encrypted .zip file is

z9-@_M_Ad5p5p7Lq

From: Nekita A. Washington <NWashington@kasowitz.com>

Sent: Tuesday, February 8, 2022 6:04 PM

To: Aly, Amr O. <AAly@jenner.com>; Schoedel, Lisa M. <LSchoedel@jenner.com>; Blumenfeld, Jack <JBlumenfeld@morrisnichols.com>; Denti, Mitchell L. <MDenti@jenner.com>; Nelson, David A. <DNelson@jenner.com>; Ying, Jennifer <jying@morrisnichols.com>; Esat, Yusuf <YEsat@jenner.com>

Cc: WSOU v. NetGear (KASOWITZ) <WSOUvNetGear@kasowitz.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>; Peter Mazur <PMazur@devlinlawfirm.com>

Subject: WSOU Investments, LLC v. Netgear, Inc., 21-cv-1117, -1119, -1120 (D. Del.)

External Email – Exercise Caution

Counsel,

In reviewing Netgear's document productions we have discovered several files that appear to be either system files or corrupt files. These files were produced with placeholders that say "UNABLE TO CONVERT." These files were also not accompanied by native files.

Please see a few bates numbers listed below for examples and a screenshot of the placeholder for reference, but the issue appears widespread.

NET0000426
NET0000428
NET0000430
NET0001024
NET0001025
NET0001026
NET0001027
NET0001335

UNABLE TO CONVERT

NET0000426

Please provide a corrected production without delay.

Regards,
Nekita

Nekita A. Washington
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David A. Nelson

Senior Paralegal

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